

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:

CITY OF DETROIT, MICHIGAN,

Debtor.

)
) Chapter 9
)

) Case No. 13-53846
)

) Hon. Steven W. Rhodes
)

**CREDITORS AMERICAN FEDERATION OF STATE, COUNTY AND MUNICIPAL
EMPLOYEES LOCAL 3308 AND LOCAL 917'S RESPONSE TO DEBTOR'S
REQUESTS FOR PRODUCTION OF DOCUMENTS**

Creditors, Local 3308 AND Local 917 of the American Federation of State, County and Municipal Employees ("Creditors" or "Locals 917 and 3308"), by and through their attorneys, Miller Cohen, P.L.C., submit the following response to Debtor's Request for Production of Documents.

Notably, Debtor has not requested any documents within its Request for Production of Documents. Instead, the Debtor presents several broad interrogatories asking inexplicable generalized questions outside the scope of the present matter. Further, it is abundantly clear that these interrogatories have not been tailored to obtain information specifically from Local 3308 and Local 917, thus, the Debtors lackadaisical approach advances several interrogatories which are ambiguous, irrelevant and overly broad. The Creditors have made a good faith effort to answer those applicable fully.

RESPONSE TO INTERROGATORIES

INTERROGATORY #1:

Identify any custodians of documents requested in the accompanying Requests for Production of Documents (served herewith).

ANSWER:

Miller Cohen Attorneys Robert Fetter and Jack Schulz

AFSCME Local 3308 President Lisa Kirklin and AFSCME Local 917 President Jonathon Mapp

INTERROGATORY #2:

Identify and describe any research, studies, or analysis conducted by, requested, reviewed, or received by you or on your behalf regarding the Plan, or any alternative to the Plan, that address issues such as, but not limited to, the City of Detroit's current financial health, projected financial health, taxes (wagering, property, income), the Detroit Institute of Arts ("DIA"), Detroit Water and Sewer Department ("DWSD"), Detroit's Public Lighting Authority ("PLA"), or the Restructuring and Reinvestment Initiatives outlined in the Plan.

ANSWER:

None.

INTERROGATORY #3:

Please indicated whether you have analyzed, or have any intention to challenge other creditors' claims and/or their recoveries if the Plan is confirmed.

ANSWER:

Yes.

INTERROGATORY #4:

Please identify a lead person or persons who have knowledge of your financial condition under different recovery levels and your financial condition in the event the Plan is not approved or is dismissed.

ANSWER:

Objection based on the question being ambiguous and irrelevant. AFSCME Local's 917 and 3308 claim that it is unclear what entity's financial condition is being referred to within the question and why it is relevant.

INTERROGATORY #5:

Please indicate whether you have purchased or sold any claims against the City of Detroit and, if so, the price at which you purchased or sold those claims and the date(s) on which you purchased or sold those claims.

ANSWER:

No.

INTERROGATORY #6:

Please indicate whether you have had any communications with any foreign or domestic governmental regulators related to the City of Detroit Bankruptcy, the Plan, or your City of Detroit debt holdings. If so, please also identify the person or persons most knowledgeable about those communications.

ANSWER:

No.

INTERROGATORY #7:

Please identify and describe any communications you have had (or that have occurred on your behalf) with any government entities (listed below) or officials, directors, agents, representatives, or employees thereof regarding the City of Detroit. This interrogatory includes, but is not limited to, any efforts to enact legislation concerning, or any effort to obtain funds for, the City of Detroit. This interrogatory covers the following governmental entities: The White House, any United States executive branch agencies or departments; the United States Congress;

the Executive Office of the Governor of the State of Michigan; the State of Michigan Legislature; the City Council of Detroit; and the Office of the Mayor of the City of Detroit.

ANSWER:

None.

INTERROGATORY #8:

Please indicate whether you or some person or entity on your behalf has communicated with the U.S. Trustee regarding the Plan.

ANSWER:

No.

INTERROGATORY #9:

Please identify a lead person or persons who have knowledge of any research, studies, or analysis conducted by, requested, or received by you or on your behalf regarding the City of Detroit's future creditworthiness with or without the Plan approval.

ANSWER:

Objection in that the question is not likely to discover information given the nature of AFSCME Locals 917 and 3308's claims.

INTERROGATORY #10:

Please indicate whether you have any common interest or joint defense agreements with any other City of Detroit creditors.

ANSWER:

Objection, the request is overly broad, ambiguous, vague and is not tailored to lead to relevant information. Creditors are labor organizations that have common interests with many other labor organization, or all other labor organizations, some of which may be creditors in this case.

INTERROGATORY #11:

Please identify any person or persons who have knowledge of debt limits or post-2006 assessments related to Limited Tax General Obligations.

ANSWER:

No.

INTERROGATORY #12:

Please identify and describe any notifications you have sent to any insurance carriers, including but not limited to potential/actual malpractice or breach of fiduciary duty claims since January 1, 2004.

ANSWER:

None.

INTERROGATORY #13:

Please identify a lead person or persons who have knowledge of any communications undertaken by you or on your behalf with any other unions, any union members, retiree associations, retiree association members, or retirees related to the City of Detroit bankruptcy or the Plan

ANSWER:

Objection in that the information requested is subject to attorney client privilege and it is also protected as work product. Further, the interrogatory is ambiguous in that AFSCME Locals 917 and 3308 are themselves unions.

INTERROGATORY #14:

Please identify a lead person or persons of documents created before January, 1, 2013, referring to any property included in the Detroit Institute of Arts, or the value of any such

property in any evaluation of the City of Detroit, the creditworthiness of the City of Detroit, or the ability of the City of Detroit to pay its debts.

ANSWER:

None.

INTERROGATORY #15:

Please identify what individual(s) or entity(ies) is/are paying your attorneys' fees and expenses associated with the City of Detroit's bankruptcy.

ANSWER:

AFSCME.

INTERROGATORY #16:

Please identify all documents that you intend to use as exhibits, including demonstrative exhibits.

ANSWER:

Information that is in the possession of the City of Detroit. Further, the documents regarding the Claims are voluminous and are available for inspection and are attached to the proof of claim.

INTERROGATORY #17:

Please identify all fact witnesses who you will call.

ANSWER:

Jonathan Mapp, Robert Davis, Lisa Kirklin, Hon. Nancy M. Blount, Hon. Michael Talbot, Hon. Kenneth King, Hon. Prentis Edwards Jr., Donnita Cleveland, Alvita Moss, Annette Rogers, Annette Walton, Marcia Lockett, Quanetta Anderson, Pamela Muldron, Samuel Jamison, Kiambu Boyd, Selena Wilson, Laticia Lemus, Michelle Hembree, Carlton Carter, Bobby Jones, Roderick Holley, Richard T. Weatherly.

INTERROGATORY #18:

Please identify all fact witnesses who you may call.

ANSWER:

See above. However, Locals 917 and 3308 reserves the right to call additional witnesses if needed.

INTERROGATORY #19:

Please identify all experts whom you intend to call to testify and identify their area of expertise.

ANSWER:

None anticipated at this time.

Respectfully submitted,

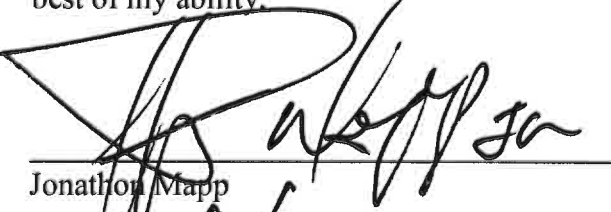
MILLER COHEN, P.L.C.

By: /s/ Robert D. Fetter
Robert D. Fetter (P68816)
Attorney for Defendant AFSCME 25
600 W. Lafayette Blvd., 4th Floor
Detroit, Michigan 48226
(313) 964-4454

Dated: May 7, 2014

VERIFICATION

I, Jonathon Mapp, have reviewed the attached Creditors American Federation of State, County, and Municipal Employees Local 3308 and Local 917's response to Debtor's requests for Production of Documents and provided the answers to the best of my ability. The answers were prepared on the advice of counsel. The answers are what I could provide as of the date I signed below. I reserve the right to make any changes if more information becomes apparent, or if the answers provided could be more complete or accurate. These answers are true and accurate to the best of my ability.



Jonathon Mapp


Date

VERIFICATION

I, Lisa Kirklin, have reviewed the attached Creditors American Federation of State, County, and Municipal Employees Local 3308 and Local 917's response to Debtor's requests for Production of Documents and provided the answers to the best of my ability. The answers were prepared on the advice of counsel. The answers are what I could provide as of the date I signed below. I reserve the right to make any changes if more information becomes apparent, or if the answers provided could be more complete or accurate. These answers are true and accurate to the best of my ability.



Lisa Kirklin



Date